

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BODYGUARD PRODUCTIONS,
INC., et al.,

Plaintiffs,

vs.

RCN TELECOM SERVICES OF
MASSACHUSETTS, LLC and RCN
TELECOM SERVICES, LLC,

Defendants.

No. 3:21-cv-15310-GC-TJB

**CONSENT MOTION FOR *PRO
HAC VICE* ADMISSION OF
KYLE G. GOTTUZO FOR
DEFENDANTS**

Defendants RCN Telecom Services of Massachusetts, LLC and RCN Telecom Services, LLC (collectively, “RCN Defendants”), through their undersigned counsel of record, move this Court, pursuant to Local Rule 101.1(c) for the *pro hac vice* admission of Kyle G. Gottuso as counsel for RCN Defendants.

In support thereof, the above-referenced the RCN Defendants rely on the attached Declaration of Kyle G. Gottuso.

/s/ Edward F. Behm, Jr.

Edward F. Behm, Jr.
ARMSTRONG TEASDALE LLP
Attorney I.D. No. 017972002
2005 Market Street
29th Floor, One Commerce Square
Philadelphia, PA 19103
Telephone: 267.780.2000
Fax: 215.405.907

CERTIFICATE OF SERVICE

I hereby certify that, on the below date, I caused a true and correct copy of the foregoing Motion for Admission *pro hac vice* of Kyle G. Gottuso, Certification of Edward F. Behm, Jr., In Support of the Motion for Admission *pro hac vice* of Kyle G. Gottuso, and Declaration of Kyle G. Gottuso in Support of the Motion for Admission *pro hac vice* to be filed via the ECF system and served on all counsel of record.

/s/ *Edward F. Behm, Jr.*

Edward F. Behm, Jr.

Dated: February 6, 2023